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P. O. Box 616
Mahopac, NY 10541
October 19, 1993
(914) 628-7952

Secretary
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

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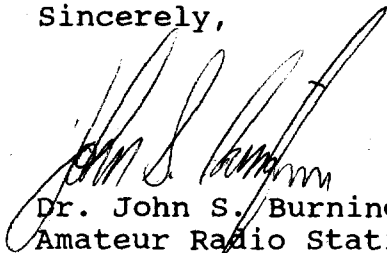
Dear Sirs:

FCC MAIL BRANCH

Please find enclosed my proposal for amendment of 47 C.F.R.
97.201(b), Amateur Radio Service.

I have enclosed twenty-five (25) copies for your reference
and distribution.

Sincerely,



Dr. John S. Burningham
Amateur Radio Station WB8PUF

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

Amendment of Sections 97.201(b).

Auxiliary Station.

RM-

Submitted: October 19, 1993

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By: Dr. John S. Burningham, WB8PUF
PO Box 616
Mahopac, NY 10541-0616

FCC MAIL BRANCH

The purpose of this proposed rule change is to allow digital packet radio networking to operate on the 6 m wavelength band. This will bring the codification of the rules and regulations governing the Amateur Radio Service into conformity with existing practices and allow the further expansion of developing technologies to the benefit of the Amateur Radio Service. The inclusion of the 6 m wavelength band is necessary for longer distance communications than are reliably capable on the 1.25 m wavelength and shorter bands now authorized for auxiliary station operation.

Part 97.1 provides the basis for the existence of the Amateur Radio Service: 97.1(a), providing emergency communications; 97.1(b), advancement of the radio art; 97.1(c), rules which provide for advancing skills in both the communication and technical phase of the art; 97.1(d), reservoir of trained operators, technicians, and electronic experts; and 97.1(e), international goodwill. The proposed rule changes are within the scope of the purpose of the Amateur Radio Service as specified in 97.1(a-d); 97.1(e) is not applicable to this proposed rule change. 97.1(c) is specifically a mandate for rule changes which will advance the communication and technical phases of the art; these proposed changes are in support of the continued development of new technologies, and the development of communication

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In the Matter of Amendment of Sections 97.201(b)

and technical expertise of the licensed amateur radio operators.

47 C.F.R. 97.3(a)(7) defines an Auxiliary station as an amateur station transmitting communications point-to-point within a system of cooperating amateur stations. This definition clearly includes stations involved in digital packet radio networking.

It must be remembered that amateur radio operators are in the hobby not for profit or commercial gain, but as a way to expand their ability and for assisting in emergencies as communicators. While the expansion of a licensee's technical ability and technological developments are often transferred to their income producing activities and therefore the American economy, this transference of ability and technology is not against the essence and rules of the Commission; but in fact specified in 97.1(b) and 97.1(d). The transfer of this technological knowledge and development is of importance to our nation for maintaining our industrial position in the community of nations.

The negative effect of not adopting the essence of this proposal is to inhibit the development of digital packet radio networking and hinder emergency communications.

I propose the following rule changes to 47 C.F.R. 97.201(b):

Existing wording:

An auxiliary station may transmit only on the 1.25 m and shorter wavelength bands, except the 431-433 MHz and 435-438 MHz segments.

Proposed wording:

An auxiliary station may transmit only on the 1.25 m and shorter wavelength bands, except the 431-433 MHz and 435-438 MHz segments. Auxiliary stations may also transmit on the 6 m band when retransmitting digital packet radio communications using the American Radio Relay League, Inc. AX.25 Amateur Packet - Radio Link - Layer Protocol, Version 2.0, October 1984 (or compatible) which is available from American Radio Relay League, Inc., 225 Main Street, Newington, Connecticut 06111.